

Gary M. Hoffman (*Pro Hac Vice*)  
Kenneth W. Brothers (*Pro Hac Vice*)  
Eric Oliver (*Pro Hac Vice*)  
DICKSTEIN SHAPIRO MORIN  
& OSHINSKY LLP  
2101 L Street, NW  
Washington, DC 20037-1526  
Phone (202) 785-9700  
Fax (202) 887-0689

Edward A. Meilman (*Pro Hac Vice*)  
DICKSTEIN SHAPIRO MORIN  
& OSHINSKY LLP  
1177 Avenue of the Americas  
New York, New York 10036-2714  
Phone (212) 835-1400  
Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715  
Jonathan Weissglass, State Bar No. 185008  
ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAINE  
177 Post Street, Suite 300  
San Francisco, California 94108  
Phone (415) 421-7151  
Fax (415) 362-8064

Attorneys for Ricoh Company, Ltd.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX INCORPORATED, et al.,

Defendants.

**CASE NO. C-03-4669-MJJ (EMC)**

SYNOPSYS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

**CASE NO. C-03-2289-MJJ (EMC)**

**DECLARATION OF ERIC OLIVER IN  
SUPPORT OF RICOH'S CLAIM  
CONSTRUCTION REPLY BRIEF**

**Date: October 20, 2004**

**Time: 2:30 p.m.**

**Courtroom: 11**

Eric Oliver declares as follows:

1. My name is Eric Oliver. I am an attorney with the law firm of Dickstein Shapiro Morin & Oshinsky LLP, counsel for Ricoh Company, Ltd. I am over the age of 21 and am competent to make this Declaration. Based on my personal knowledge and information, I hereby declare to all the facts in this Declaration.

2. Attached hereto as Exhibit 1 is a true and correct copy of the cover page and page 375 from the *IEEE Standard Dictionary of Electrical and Electronics Terms* (4th ed. 1988) (RCL011414-15).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Signed at Washington, DC on September 20, 2004.

September 20, 2004

/s/ Eric Oliver  
Eric Oliver



***An American National Standard***  
***Acknowledged as An American National Standard***  
***July 8, 1988***

**IEEE**  
**Standard Dictionary**  
**of**  
**Electrical and**  
**Electronics**  
**Terms**

**Fourth Edition**

U.S. EPA Headquarters Library  
Mail code 3201  
1200 Pennsylvania Avenue NW  
Washington DC 20460

RCL011414

ICY

## final value

375

## firing angle

period to the loading prescribed for the loading district in which it is situated, or equivalent loading, and the loading removed. Final unloaded sag includes the effect of inelastic deformation (creep). 262

**final value (industrial control).** The steady-state value of a specified variable. *See:* control. 206

**final voltage.** *See:* cutoff voltage.

**finder switch.** An automatic switch for finding a calling subscriber line or trunk and connecting it to the switching apparatus. 328

**finding (telephone switching systems).** Locating a circuit requesting service. 55

**fine chrominance primary (National Television System Committee (NTSC) color television).** An obsolete term. Use the preferred term, I chrominance signal. 18

**finer (cable plowing).** Particles of earth or rock smaller than 1/8 in greatest dimension. 52

**F<sub>1</sub> layer (radio wave propagation).** The lower of the two ionized layers normally existing in the F region in the day hemisphere. 146

**F<sub>2</sub> layer (radio wave propagation).** The single ionized layer normally existing in the F region in the night hemisphere and the higher of the two layers normally existing in the F region in the day hemisphere. 146

**finger (rotating machinery).** *See:* end finger.

**finger line (conductor stringing equipment).** A lightweight line, normally sisal, manila or synthetic fiber rope, which is placed over the traveler when it is hung. It usually extends from the ground, passes through the traveler and back to the ground. It is used to thread the end of the pilot line or pulling line over the traveler and eliminates the need for workmen on the structure. These lines are not required if pilot lines are installed then the travelers are hung. 431

**finishing (electrotype).** The operation of bringing all parts of the printing surface into the same plane, or, more strictly speaking, into positions having equal printing values. *See:* electroforming. 328

**finishing rate (storage battery) (storage cell).** The rate of charge expressed in amperes to which the charging current for some types of lead batteries is reduced near the end of charge to prevent excessive gassing and temperature rise. *See:* charge. 328

**finite energy signal.** *See:* energy density signal.

**finite state machine (software).** A computational model consisting of a finite number of states and transitions between these states. *See:* model. 434

**finite-time stability.** *See:* stability, finite-time.

**finsen.** The recommended practical unit of erythermal flux or intensity of radiation. It is equal to one unit of erythermal flux per square centimeter. 328

**fire-alarm system.** An alarm system signaling the presence of fire. *See:* protective signaling. 328

**fire-control radar (navigation aid terms).** A radar whose prime function is to provide information for the manual or automatic control of artillery or other weapons. 526

**fire detection and fire protection systems (nuclear power generating station).** Definitions of terms relat-

ing to fire detection and protection systems and equipment may be found in the National Fire Protection Association (NFPA) Handbook. 439

**fire-door magnet.** An electromagnet for holding open a self-closing fire door. 328

**fire-door release system.** A system providing remotely controlled release of self-closing doors in fire-resisting bulkheads to check the spread of fire. *See:* marine electric apparatus. 328

**fired tube (microwave gas tubes)(nonlinear, active, and nonreciprocal waveguide components).** The condition of the tube during which a radio frequency glow exists at either the resonant gap, the resonant window, or both. *See:* gas tube; limiting threshold. 125, 530

**fireproofing (of cables)(NESC).** The application of a fire-resistant covering. 494

**fire rating (cable penetration fire stop qualification test).** The term applied to cable penetration fire stops to indicate the endurance in time (hours and minutes) to the standard time-temperature curve in ANSI/ASTM E119-76, while satisfying the acceptance criteria specified in this standard. 368

**fire-resistance rating.** The measured time, in hours or fractions thereof, that the material or construction will withstand fire exposure as determined by fire tests conducted in conformity to recognize standards. 328

**fire-resistant.** So constructed or treated that it will not be injured readily by exposure to fire. *Syn:* fire-resistantive. 328

**fire-resistive barrier (1) (cable penetration fire stop qualification test).** A wall, floor, or floor-ceiling assembly erected to prevent the spread of fire. (To be effective, fire barriers must have sufficient fire resistance to withstand the effects of the most severe fire that may be expected to occur in the area adjacent to the fire barrier and must provide a complete barrier to the spread of fire.) 368

**(2)(cable-penetration fire stops, fire breaks, and system enclosures)(design and installation of cable systems for Class 1E circuits in nuclear power generating stations).** A wall, floor, or floor-ceiling assembly erected to prevent the spread of fire. 536

**fire-resistive barrier rating (cable-penetration fire stops, fire breaks, and system enclosures)(design and installation of cable systems for Class 1E circuits in nuclear power generating stations).** This is expressed in time (hours and minutes) and indicates that the wall, floor, or floor-ceiling assembly can withstand, without failure, exposure to a standard fire for that period of time. *Note:* The test fire procedure and acceptance criteria are defined in ASTM E 119-1981. 536

**fire-resistive construction.** A method of construction that prevents or retards the passage of hot gases or flames as defined by the fire-resistance rating. 328

**firing angle (semiconductor rectifier operating with phase control).** *See:* angle of retard (semiconductor rectifier operating with phase control).